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June 6, 2022

Via: ECF

Hon. Ann Marie Donio, U.S.M.J.
United States District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Court Room 3B
Camden, NJ 08101

Re: Gould, et al. v. Guida Dairy, et al.
Docket No.: 1:22-cv-1861-NLH-AMD
Automatic Extensions/ECF Notifications

Your Honor:

I represent the Plaintiffs in the above-captioned matter. On May 23, 2022, the Defendants herein filed two motions: a Motion to Dismiss and a Motion to Strike Class Allegations (collectively, "Motions"). Those Motions are both presently returnable on June 21, 2022.

I am writing to respectfully request an automatic extension for both pending Motions, pursuant to L.Civ.R. 7.1(d)(5). The originally noticed motion day for each of the Motions has not previously been extended or adjourned, and Plaintiffs' opposition papers are not currently due until tomorrow, June 7, 2022. Plaintiffs propose that both Motions be heard on the next motion day, which is **July 5, 2022**. If the Court is amenable to this request, Plaintiffs' opposition papers and Defendants' replies would then be due on June 21, 2022, and June 28, 2022, respectively.

Plaintiffs are seeking these extensions for several reasons. Since the time the Motions were filed, I have been ill with COVID-19, and had to engage in intensive trial preparation after I recovered, for a jury trial that was scheduled in Middlesex Superior Court.

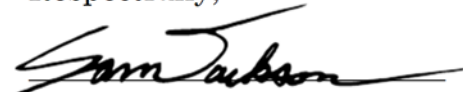
Furthermore, I did not receive any ECF notifications regarding the filing of the Motions, so I did not have the full amount of time available to me to oppose them. In fact, no one at my entire law firm received any ECF notifications about the Motions. The most recent ECF notification I received was on April 27, 2022, relating

to the stipulation extending Defendants' time to answer. I only learned about the pending Motions when I was contacted by news media for comment about them.

As soon as we became aware of the issue, a member of my staff requested assistance from the Court's IT department to correct it, but they were unable to help. Please accept this letter as my respectful renewal of Plaintiffs' request to sort out the notification issue, so that no prejudice occurs to any of the parties.

I thank the Court for its kind attention to this matter.

Respectfully,


Samuel D. Jackson, Esquire

CC via email: Philip A. Goldstein, Esq., pagoldstein@mcguirewoods.com